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U.S. DISTRICT COURT

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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER

Plaintiff

v.

JOSHUA MOON ET AL,

Defendants

**PLAINTIFF'S EMERGENCY MOTION
FOR PROTECTIVE ORDER**

Case No.: 2:24-cv-00421-DBB-JCB

Plaintiff Russell Greer comes forward now and requests a protective order under FRCP 26(C).

I. INTRODUCTION

Two weeks ago, plaintiff requested a continuance because he had accidentally scheduled a city meeting in Winnemucca, Nevada on May 6th, forgetting about that there was a case hearing the same day. Winnemucca wouldn't reschedule and this Court wouldn't reschedule, so plaintiff showed up to the court hearing and then showed up late to the city hall and was able to present his motion.

That should have been the end of that; however, Defendants have bizarrely made it their business to get into plaintiff's personal business, none of which has to do the copyrights at hand.

On May 21, 2025, Defendants' attorney CC'd a Winnemucca realtor and threatened to subpoena him for plaintiff's supposed "fraud on the courts". **EXHIBIT A.**

This is becoming ridiculous. Not only has Mr. Hardin's actions damaged personal relationships, but his actions are becoming very intrusive, annoying and have nothing to do with this case. Plaintiff therefore seeks an EMERGENCY case protective order before he goes to the Las Vegas police. Plaintiff is trying to avoid that, as that would make this case very hard to litigate.

FRCP 26(C)

Federal Rules of Procedure 26(C) allow a party to seek a protective order to protect a party from "annoyance, embarrassment, oppression or undue burden."

PLAINTIFF HAS ATTEMPTED IN GOOD FAITH to CONFER WITH DEFENDANTS

Following FRCP 26(C)(1), plaintiff attempted to confer with Defendants on 5-12-25, asking them to stop. **EXHIBIT A.** Mr. Hardin replied that he was conducting research. This then led to Defendants seeking to subpoena all communications from a Winnemucca realtor named Waylon Huber. After that, on May 21st, Mr. Hardin harassingly subpoenaed Waylon and accused plaintiff

of “fraud on the courts” and that Greer had “roped” Waylon in with his “frauds”. **EXHIBIT B.** This assertion was absolutely ridiculous, and plaintiff told Mr. Hardin so because Plaintiff has said repeatedly that he has little money and was relying on investors. **EXHIBIT C.** Mr. Hardin has never once stopped to ask Plaintiff about all of this before embarking on this harassment discovery request campaign.

To be quite frank, when plaintiff requested IFP status in 2020, he was actually making more money than he is now. Plaintiff spent last summer sleeping in a car. They were the 4 most miserable months of his life. While plaintiff is trying to start a business, it is not up and running. Plaintiff is in contact with investors who are interested in helping Greer’s start up and so he was going to Winnemucca as a middle man for the investors and as the founder of a fledgling startup company. That’s all he was doing.

Regarding “frauds on the court,” plaintiff has just explained that in 2020 he was making more money than he is now. Plaintiff also had more expenses in 2020, so plaintiff has been able to save up money now.

So not only is Mr. Hardin assuming wrongly about plaintiff’s wealth and his mindset, but Mr. Hardin is now harassing innocent people who have nothing to do with this case. This is a case about copyright, not about land in winnemucca or whether vice should be legal or debates on subjective notions of morality. Plaintiff will say once again: he goofed up by scheduling the city hall the same day as the court hearing. That’s all it was. Defendants are now harassing innocent people, using discovery as an excuse, and it needs to stop.

MOTION FOR EMERGENCY PROTECTION ORDER

Plaintiff seeks a case protective order to protect plaintiff and those who are associated or connected with plaintiff from being annoyed and embarrassed from Matthew Hardin’s and defendants’ annoying discovery that has nothing to do with copyright law.

Plaintiff seeks a protective order requesting Mr. Hardin and defendants stop contacting: (1) Waylon Huber, (2) anybody from the city of Winnemucca in regards to Russell Greer, (3) anybody from any other Nevada county or city regarding Russell Greer, (4) anybody else that Defendants believe plaintiff does business with, (5) anybody that has nothing of value to offer to anything pertaining to the copyrights at issue.

Plaintiff also seeks that Mr. Hardin stop bringing up Plaintiff's past restraining orders, whether being mentioned in this case or being mentioned to others for the purposes of discovery. Mention of the restraining orders is embarrassing, annoying and rather unfair since this Court dismissed the defamation claims regarding Greer's "many victims", to quote defendants' site. Further, those restraining orders have expired.

Respectfully submitted,

Russell Greer

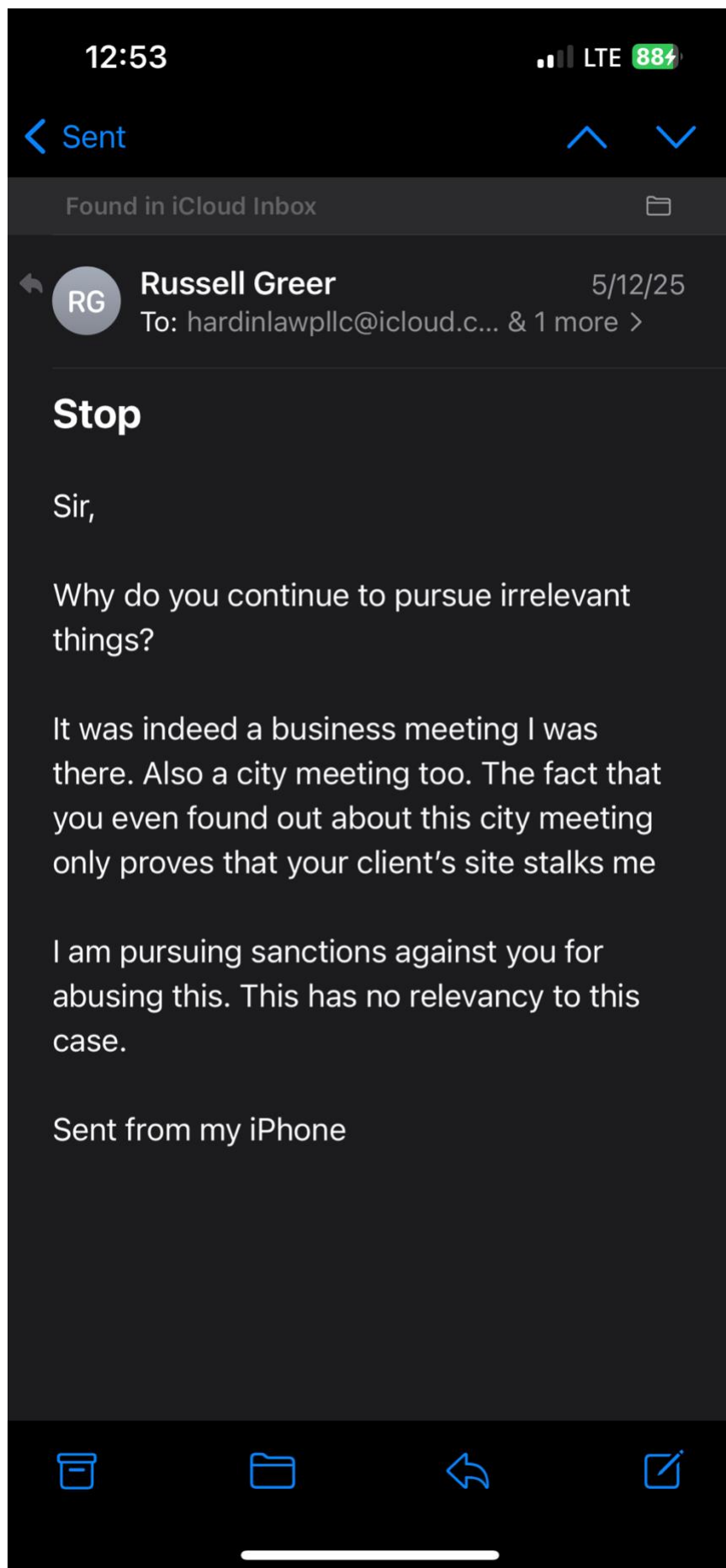
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5-21-25

CERTIFICATE OF SERVICE:

Pursuant to FRCP 5(b), I certify that on 5-21-25, I served a true and correct copy of the attached document by ECF to all attorneys on record.

EXHIBIT A



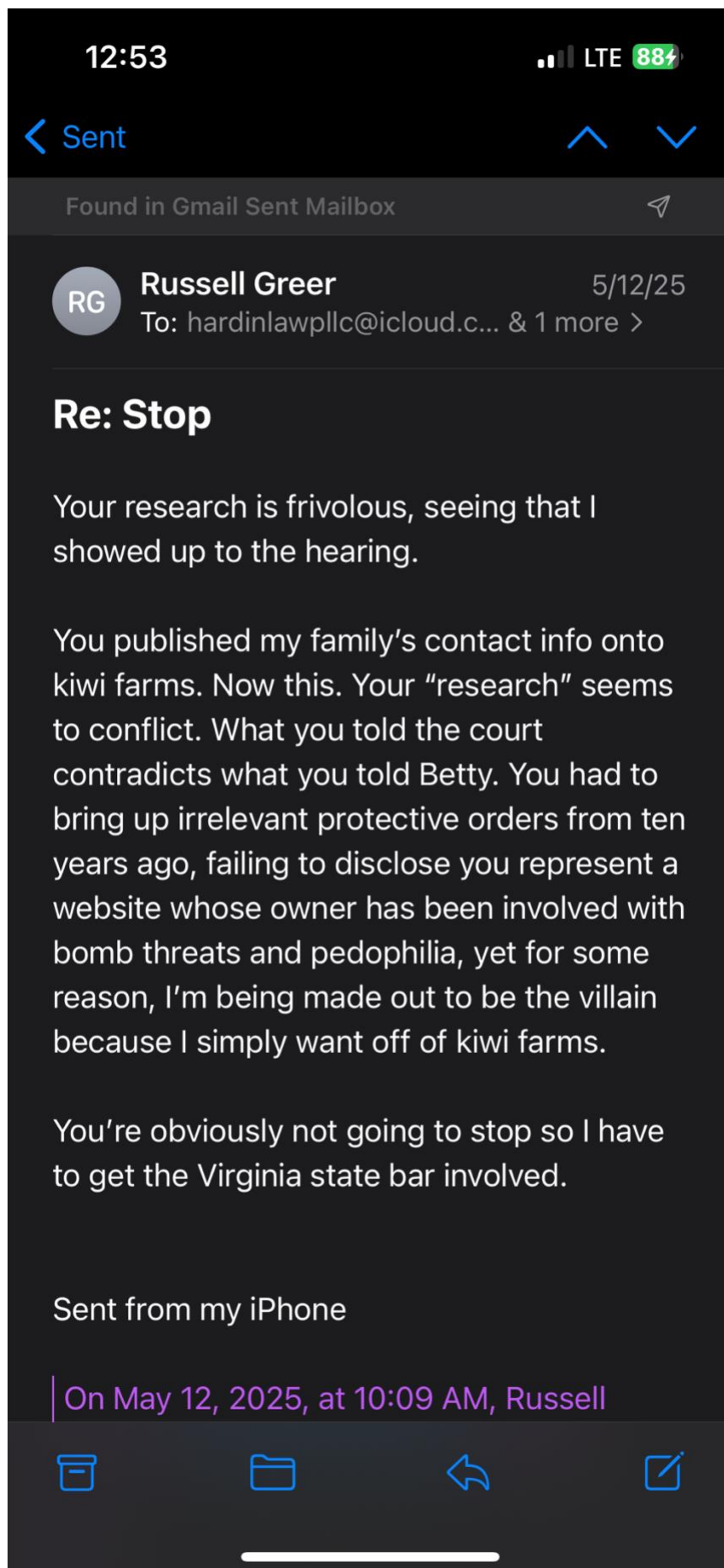


EXHIBIT B

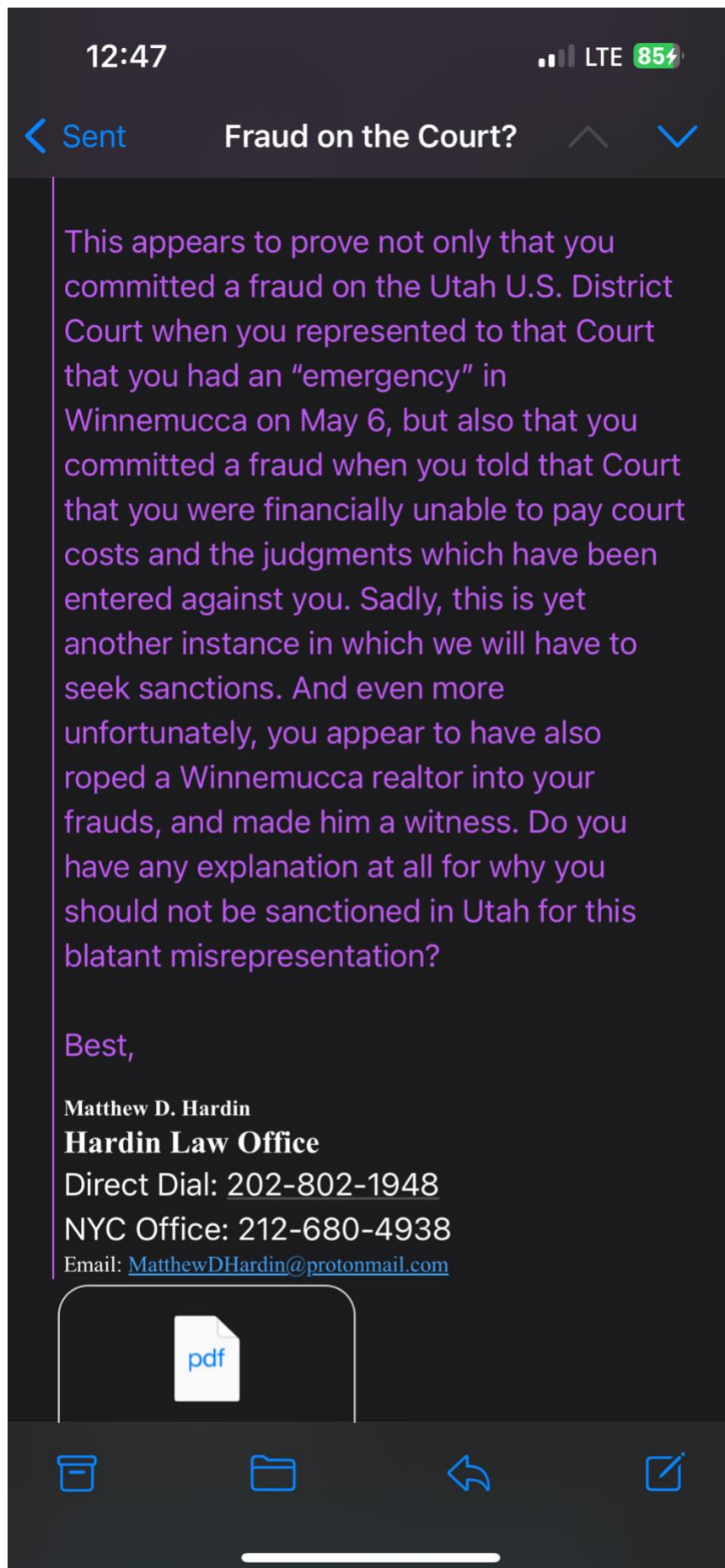


EXHIBIT C

